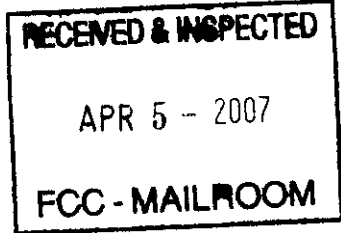


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In Re the Matter of:

DAVID L. TITUS,

Amateur Radio Operator and Licensee of
Amateur Radio Station KB7ILD.

EB Docket No. 07-13
FRN No. 0002074797
File No. EB-06-IH-5048

DAVID TITUS' SPECIFIC RESPONSES
AND OBJECTIONS TO THE BUREAU'S
FIRST DOCUMENT REQUESTS

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DAVID TITUS' SPECIFIC RESPONSES AND OBJECTIONS
TO THE BUREAU'S FIRST DOCUMENT REQUESTS
Page 1

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DAVID S. MARSHALL
1001 Fourth Avenue, 44th Floor
Seattle, Washington 98154-1192
Telephone 206.826.1400
Fax 206.389.1708

ORIGINAL

RESPONSES TO SPECIFIC DOCUMENT REQUESTS

Request 1: Copies of all documents relating to each and every felony conviction of David L. Titus.

Mr. Titus objects to this request because it arguably requires production of documents protected by the work product doctrine and attorney client privilege, as well as documents not in Mr. Titus' but in third parties' possession, custody or control. Without waiving his objections, Mr. Titus further responds as follows:

Mr. Titus will produce the pleadings which he has in his possession from his only felony conviction. If Mr. Titus subsequently finds additional pleadings, those will also be produced. Mr. Titus has no other documents in response to this request in his possession. If he finds any, Mr. Titus will also produce any non-privileged documents following the entry of a mutually agreed upon protective order and produce a privilege log listing any documents that he withholds.

Request 2: Copies of all applications and correspondence that David L. Titus has filed with or otherwise sent to the Commission since January 1, 1997.

Mr. Titus objects to this request as unduly burdensome and harassing because the Enforcement Bureau has access to all such documents. Without waiving his objections, Mr.

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DAVID TITUS' SPECIFIC RESPONSES TO OBJECTIONS
TO THE BUREAU'S FIRST DOCUMENT REQUESTS
Page 2.

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Titus further responds as follows:

To the extent that he locates any such documents, Mr. Titus will produce.

DATED this 3~~A~~ day of April, 2007.

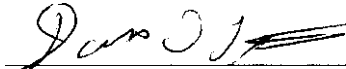


DAVID S. MARSHALL, WSBA No. 11716

STEVEN D. BROWN, WSBA #11759

Attorneys for David L. Titus

, DAVID L. TITUS, certify that the foregoing interrogatory answers are true and correct.


DAVID L. TITUS

04/03/07
Date

Signed at Seattle, Washington.

\\ADSM\CLIENT FOLDERS\Titus\Da\A-3 Pleadings\rsp&obj to 1st doc requests 040307.doc

DAVID TITUS' SPECIFIC RESPONSES AND OBJECTIONS
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Page 3.

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